

TEITELBAUM & BASKIN, LLP
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as servicer for Deutsche Bank National
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Hearing Date: March 17, 2010
Hearing Time: 10:30 a.m.
Objection Deadline: March 16, 2010
4:00 P.M.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re : Chapter 7
:
SILVIA NUER, : Case No. 08-14106 (REG)
:
Debtor. :

**NOTICE OF MOTION FOR THE ENTRY OF A PROTECTIVE ORDER
PURSUANT TO BANKRUPTCY CODE § 105 AND BANKRUPTCY RULES 7026(c),
7030 (b)(4) AND 9014 (I) ESTABLISHING THE SCOPE OF APPROPRIATE
DISCOVERY PURSUANT TO BANKRUPTCY RULE 7026 (b)(1) and (c) IN RESPONSE
TO THE DEBTOR'S REQUESTS MADE PURSUANT TO BANKRUPTCY RULES
7030(B)(1), (B) (2) AND 7034; (II) DIRECTING THE CONDUCT OF A TELEPHONIC
DEPOSITION; AND (III) EXTENDING THE DISCOVERY PERIOD TO MARCH 31,
2010**

PLEASE TAKE NOTICE that JP Morgan Chase Bank, N.A., as servicer ("**Chase**") for Deutsche Bank National Trust Company, as Trustee ("**Deutsche Bank**" or the "**Trustee**") for Long Beach Mortgage Trust 2006-2 (the "**Trust**"), by and through its undersigned counsel, filed a motion (the "**Motion**") for entry of an order, pursuant to section 105(a) of title 11 of the United States Code (the "**Bankruptcy Code**") and Fed. Bankr. R. 7026(c), 7030(b)(4) and 9014, for an order (i) establishing the scope and extent of discovery sought by the Debtor pursuant to an Amended Notice of Deposition and Request for Production of Documents, made pursuant to

Fed. Bankr. R. 7030 (b) (1) (*sic*)¹, (b) (2) and 7034, dated January 22, 2010 (the “**Discovery Request**”); (ii) directing that the deposition of Ronaldo Reyes be conducted telephonically; and (iii) extending the discovery period to March 31, 2010.

PLEASE TAKE FURTHER NOTICE, that a hearing on the Motion will be held before the Honorable Robert E Gerber, United States Bankruptcy Judge, at the United States Bankruptcy Court, Alexander Hamilton Customs House, Courtroom 621, One Bowling Green, New York, New York 10004 (the “Bankruptcy Court”), on **March 17, 2010 at 10:30 a.m.** (prevailing Eastern time) or as soon thereafter as counsel may be heard (the “Hearing”).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must (i) be in writing; (ii) state the name and address of the objecting party and nature of the claim or interest of such party; (iii) state with particularity the legal and factual bases of such objection; (iv) conform to the Federal Rules of Bankruptcy Procedure and Local Bankruptcy Rules; (v) be filed with the Bankruptcy Court, together with proof of service, electronically, in accordance with General Order M-242, as amended by General Order M-269 (available at the Court’s website, www.nysb.uscourts.gov) by registered users of the Court’s Electronic Case Files system, and by all other parties in interest, on a 3.5 inch disk or CD-ROM, preferably in Portable Document Format (PDF), WordPerfect or any other Windows-based word proceeding format no later than **March 16, 2010 at 4:00 p.m.** (the “Objection Deadline”); and served on Teitelbaum & Baskin, LLP, 3 Barker Avenue, White Plains New York 10601, Attn: Jay Teitelbaum, with a courtesy copy to the chambers of the Honorable Robert E. Gerber, One Bowling Green, New York, New York 10004, Courtroom 621. Unless objections are received by the Objection Deadline, the Motion may be granted upon default.

1 The Discovery Request appears to be intended as a request pursuant to Rule 30(b) (6) in that it demands that Chase designate one or more witnesses with knowledge of the matters in such request.

PLEASE TAKE FURTHER NOTICE, that objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: White Plains, New York
March 8, 2010

TEITELBAUM & BASKIN, LLP
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as servicer for Deutsche Bank National
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Beach Mortgage Trust 2006-2

By: /s/ Jay Teitelbaum

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